

Molly Smith Artistic Director Edgar Dobie Executive Director Zelda Fichandler Founding Director

October 12, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O’Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioners Clyburn, O’Rielly, Carr, Rosenworcel, and Ms. Dortch:

On behalf of Arena Stage in Washington DC, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices. Arena Stage provides approximately 700 performances per year to 300,000 audience members and education programs to 20,000 students. Arena Stage’s vision statement is to galvanize the transformative power of theater to understand who we are as Americans. Our focus is on American artists and we produce diverse and innovative works as well as nurturing new plays. We produce and present all that is passionate, exuberant, profound, deep and dangerous in the American spirit. We explore issues from the past, present and future that reflect America’s diversity and challenges, voiced through the productions we create, the work we develop, the presentations that move beyond our stage, and community and education programs that engage artists, students and audiences.

We strongly support the Commission’s proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while mitigating significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

Under the leadership of our Sound Director, Timothy M. Thompson, Arena Stage uses wireless devices in all performances. Wireless devices, including handheld and body pack wireless microphones, RF headsets and portable radio communication, OSC, MIDI, and other show control protocols, and cue and trigger controllers, are crucial to Arena Stage delivering its world-class productions. Currently, our audience members use 72MHz assistive listening systems and actors use 518 MHz – 578 MHz wireless microphones. Outside of the TV bands, our technicians use 1.897

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MHz – 1.933 MHz RF headset communications, 438 MHz – 470 MHz portable radio communications and 2.4 GHz RF headset communications.

Because of the prohibition of wireless microphones in the 700MHz band, however, Arena Stage was forced to spend \$60,000 replacing and retuning identical equipment in the 518MHz – 578MHz band. As a not-for-profit arts organization, Arena Stage was not only affected financially by this ban, but has been required to restructure artistically as well. After working with Tim for twenty-five years and identifying the value in his advocacy for wireless devices, we urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

I appreciate that the Commission has sought Public Comment on this very important issue. Professional performing arts organizations and educational institutions should have access to reliably available spectrum with interference protection. I request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my organization's sound equipment. Once that investment has been made, I would like some assurance that the system will work properly and without interference.

Performing arts organizations like Arena Stage provide demonstrable service to the public in improving quality of life, preserving our cultural musical theater heritage, and providing education, enlightenment, and entertainment. We also contribute to local economies in every community across this country. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones. The proposal is a much-needed solution that benefits the arts community and the public as well as the many new and emerging unlicensed white space technologies.

Thank you for considering this important request for your support.

Sincerely,



Edgar Dobie